

**Federal Defenders
OF NEW YORK, INC.**

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May 2, 2024

Via ECF

Hon. Barbara Moses
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re. United States v. Aramis Burgos de la Cruz
23 Mag. 4791 (UA)**

Dear Judge Moses,

I write with the consent of Pretrial Services and the government to respectfully request that the pretrial release conditions for Mr. Burgos de la Cruz in the above-captioned matter be modified to permit his travel to the District of New Jersey and to remove the curfew and location monitoring condition.

Mr. Burgos de la Cruz currently works as a TLC-licensed livery car driver and often has passengers who request transportation to New Jersey. In addition, Mr. Burgos de la Cruz would be able to earn extra income if he were permitted to work overnight shifts. For these reasons, we respectfully request that the pretrial release conditions for Mr. Burgos de la Cruz be amended to permit travel to New Jersey and to remove the curfew and location monitoring requirement.

We thank the Court for its consideration of this request.

Sincerely,

/s/

Neil P. Kelly
Assistant Federal Defender
(212) 417-8744

cc: AUSA Jackie Delligatti
Pretrial Services Officer Marlon Ovalles

APPLICATION GRANTED


Barbara Moses, U.S.M.J.

5/2/24